

12 June 2014

John Pierce
Chair
Australian Energy Market Commission
PO Box A2449
SYDNEY SOUTH NSW 1235
Via: AEMC's website



Your Ref: ERC0171

Dear Mr Pierce

Customer access to information about their energy consumption

The Public Interest Advocacy Centre (PIAC) is an independent, non-profit, law and policy organisation that works for a just and democratic society by taking strategic action on public interest issues. PIAC has, as a key area of work, energy and water policy. The Energy + Water Consumers' Advocacy Program (EWCAP) represents the interests of low-income and other residential consumers of electricity, gas and water in New South Wales.

We (PIAC, the Alternative Technology Association, Uniting Care Australia and CHOICE) welcome this rule change proposal from the Council of Australian Governments and the COAG Energy Council, and thank the AEMC for the opportunity to provide this late submission.

We are strongly supportive of the rule change including:

- clarifying customer access to energy use data,
- AEMO developing 'data provision procedures
- the development of a requirement for information sheets
- AER developing Metering Data Common Terminology Guidelines.

Question 3 Access to data

In our view, it is appropriate that the NER be amended to allow a customer to access its consumption data by requesting that data from its DNSP and Metering Data Providers (MDPs) should be able to provide electricity consumption data directly to customers or their agents.

Question 4 Minimum format requirements

AEMC's proposed summary format looks sensible and could be market-tested with consumer welfare organisations (CWOs) and the Alternative Technology Association.

Ideally, metering data would be provided in a form such that consumers can interpret it easily and make optimal choices about how to manage their own consumption. The rule change should also ensure data is provided in a machine-readable format that enables CWOs, consumer organisations and other authorised agents to create services to assist consumers to interpret and engage with their data.

In order to maximize the utility of the data, it would seem sensible for customers to be able to specify the time period of their data request, rather than this being determined by the National Electricity Rules.

Question 5 Timeframe to respond to a request

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PIAC would like the AEMC to explore how the rule change can facilitate the quickest viable access to data for consumers, especially given that data for consumers with smart meters should be able to be provided promptly, ideally in real time.

Question 6 Fees payable by a customer

We believe this is unlikely to be a major issue, but to prevent poor conduct, a cap could be placed on the number of times a month customers could be request their energy consumption free of charge (in line with retailer moves to monthly billing).

Question 7 Timeframe for making and revising data provision guidelines

We believe the data provision guidelines should be published as soon as possible and reviewed annually (at the longest every two years) given the speed at which the electricity market is changing.

Question 8 Request from large customers

Given the potential of electricity consumption data to assist all users to better manage their energy use, including at peak times, we believe it should be available free-of-charge to all users, large and small.

Question 9 Access by authorised agents or service providers

The rule change should help ensure explicit informed consent is obtained from customers to enable authorised agents access to their data for explicit purposes.

Question 10 Informing consumers about the uses of their electricity consumption data

We support the proposals to publish standard information on the websites of retailers and DNSPs and 'metering data common terminology guidelines' to provide transparency for consumers and further reduce information barriers to consumers participating in demand side management.

If you require any further information from PIAC in relation to this matter, please do not hesitate to contact me or Dr Gabrielle Kuiper, EWCAP Senior Policy Officer, on 02 8898 6520 or gkuiper@piac.asn.au.

Yours sincerely



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